

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JANE DOE,)
v. Plaintiff,) Case No. 21-cv-11062-IT
CITY OF BOSTON, BOSTON POLICE)
DEPARTMENT and INDIVIDUAL OFFICERS,)
Defendants.)

JOINT STATEMENT

Pursuant to Fed. R. Civ. P. 16(b), Local Rule 16.1, and this Court's June 7, 2021 Notice of Scheduling Conference, Plaintiff Jane Doe and Defendants City of Boston, Boston Police Department and Individual Officers hereby submit their Joint Statement. The parties note that this case was recently transferred from the U.S. District Court for the District of Columbia under 28 U.S.C. § 1406(a) following that Court's ruling that it lacked personal jurisdiction over Defendants.

1. Parties' Proposed Motion and Pretrial Schedule.

- a. Defendants' motion to dismiss under Fed. R. Civ. P. 12(b) shall be filed by September 13, 2021, Plaintiff's opposition thereto by October 12, 2021, and Defendant's reply by October 24, 2021.
- b. Initial disclosures and Local Rule 16.1(d)(3) certifications shall be filed within 21 days of a Court ruling denying Defendants' motion to dismiss.
- c. All fact discovery shall be completed within twelve months of the parties' filing of initial disclosures and Rule 16.1(d)(3) certifications.

d. Motions for summary judgment shall be filed within 45 days of the close of discovery, with oppositions due 30 days thereafter.

e. Expert discovery, if any, shall be completed within 90 days of a Court ruling denying summary judgment.

f. Trial shall be scheduled no sooner than 60 days after the close of expert discovery.

2. Pending Motions.

The parties state that there are no pending motions. However, as indicated, Defendants intend to file a motion to dismiss under Fed. R. Civ. P. 12(b).

3. Matters To Be Discussed At Scheduling Conference.

That parties state that, aside from the aforementioned case schedule on which the parties agree, there are no matters that need to be discussed at the Scheduling Conference.

4. Reassignment To Magistrate.

The parties do not currently consent to a reassignment of the case to a magistrate judge for all purposes but intend to further explore the issue with their clients and report back to the Court.

Respectfully submitted,

PLAINTIFF JANE DOE

DEFENDANTS CITY OF BOSTON, BOSTON
POLICE DEPARTMENT AND INDIVUDAL
OFFICERS

/s/Aderson Francois

Aderson Francois

Aderson.Francois@georgetown.edu
Georgetown University Law Center
Civil Rights Clinic
600 New Jersey Avenue NW, Suite 352
Washington, D.C. 20001
(202) 661-6721

/s/John M. Simon

Kay H. Hodge (BBO #236560)

khodge@scmllp.com

John M. Simon (BBO #645557)

jsimon@scmllp.com

Stoneman, Chandler & Miller LLP
99 High Street

Boston, MA 02110

(617) 542-6789

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent by first class mail, postage prepaid, to those indicated as non-registered participants on August 3, 2021.

/s/John M. Simon

John M. Simon